



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 03 2014

CERTIFIED MAIL 7012 1010 0001 8097 0979
RETURN RECEIPT REQUESTED

City of Greensboro
Attn.: Mr. Steven Drew
Director, Water Resources Department
2602 South Elm-Eugene Street
P.O. Box 3136
Greensboro, North Carolina 27402-3136

Re: Notice of Violation
National Pollutant Discharge Elimination System Permit Nos.: NC0047384, NC0024325
Greensboro T.Z. Osborne Wastewater Treatment Plant
North Buffalo Creek Wastewater Treatment Plant

Dear Mr. Drew:

The purpose of this letter is to advise the City of Greensboro (the City) that the U.S. Environmental Protection Agency Region 4 has reviewed the information submitted by the City on November 20, 2012, and October 14, 2013, in response to the EPA's information request letters issued on October 23, 2012, and September 26, 2013, pursuant to Section 308 of the Clean Water Act (CWA), 33 U.S.C. § 1318.

Based upon review of the information submitted, the EPA has determined that the City has violated the CWA as follows:

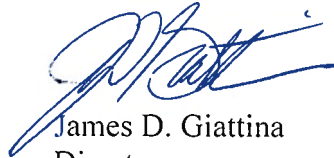
During the period of December 2008 through September 2013, the City had at least 506 Sanitary Sewer Overflows (SSO) that discharged from the City's Wastewater Collection and Transmission System (WCTS) to navigable waters of the United States as defined by Section 502 of the CWA, 33 U.S.C. § 1362. The City also had an additional 177 SSOs, for a total of 683 SSOs that violated Part II.C.2. of the City's National Pollutant Discharge Elimination System (NPDES) Permit, which requires the WCTS be properly operated and maintained. Such SSOs were not authorized by a NPDES permit and therefore, are violations of Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

The EPA has decided not to initiate an enforcement action at this time. However, the City's future progress in developing and implementing written Management, Operations and Maintenance (MOM) programs and progress towards eliminating SSOs will determine if future EPA enforcement actions are warranted. The EPA will monitor the City's progress in developing and implementing MOM programs over the next two years.

Until compliance with the CWA is achieved, the City is considered to be in violation of the CWA and subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This Section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

If you have any questions regarding this Notice of Violation, please contact Ms. Laurie Jones, of my staff, at (404) 562-9201 or by email at jones.laurie@epa.gov, or you may address written correspondence to Ms. Laurie Jones at the above address on the letterhead.

Sincerely,



James D. Giattina

Director

Water Protection Division

cc: Mr. Charles Wakild, P.E.

North Carolina Department of Environment and Natural Resources